

ROBERT GUILD

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June 29, 2018

Ms. Jocelyn D. Boyd
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, SC 29210

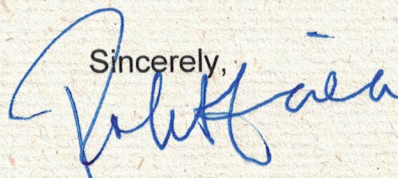
In Re: Friends of the Earth and Sierra Club v. SCE&G, etc.
Docket Nos. 2017-207--E, 2017-305-E and 2017-370-E

Dear Ms. Boyd:

In accord with the Hearing Officer's Directive of June 25, 2018, Order No. 2018-74-H, I am hereby reporting on behalf of Friends of the Earth and Sierra Club that I have attempted unsuccessfully to resolve disputed discovery matters with counsel for SCE&G. Counsel for SCE&G has declined my request to agree to a narrowed protective order, with a scope limited to restrict disclosure of only those discovery materials determined to be privileged, trade secret, commercially sensitive, or otherwise confidential, whose disclosure would cause particularized harm. Counsel for SCE&G further declined to permit the conduct of a nuclear project site inspection, by the persons previously agreed to and focused on the particular items and subjects to be inspected, also previously agreed to, as referenced in e-mail communication by counsel on March 2, 2018. We respectfully request that the Hearing Officer reconsider his decision to issue a protective order as proposed; or, in the alternative, that any such protective order be narrowly tailored in scope as argued in our Motion to Overrule or Clarify the Order of the Hearing Officer on Motions to Compel Discovery, filed this date. I am copying the Hearing Officer and the parties with this letter by electronic mail.

With kind regards I am

Sincerely,



Robert Guild

Encl.s

CC: Hearing Officer and all Parties

